

# **EXHIBIT A**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Norfolk Division**

R.M.S. TITANIC, INC.,  
successor-in-interest to  
Titanic Ventures, limited partnership,  
Plaintiff,

v.

Civil Action No. 2:93cv902

THE WRECKED AND ABANDONED VESSEL, et al  
Defendant.

**DECLARATION OF BRETTON HUNCHAK CONCERNING  
PLAINTIFF R.M.S. TITANIC, INC.'S MOTION FOR EXTENSION OF TIME**

1. My name is Brettton Hunchak. I am currently the President for R.M.S. Titanic, Inc. ("RMST"). I have served in this capacity since February 2019.

2. I am over eighteen years of age and am competent to testify regarding the matters set forth in this Declaration.

3. I have personal knowledge concerning the facts set forth in this Declaration.

4. I have been personally involved in RMST's negotiations with experts, vendors, and funding partners concerning RMST's plans for an expedition to recover the Marconi wireless device and other artifacts from the Marconi Suite (the "Marconi Artifacts") at the Titanic wreck site.

5. Based on this experience, I am certain that the National Oceanic and Atmospheric Association is using threats and its considerable financial and political leverage in the world of undersea exploration to intimidate experts and vendors from partnering with RMST.

6. Dr. John Broadwater, one of the lead scientists who worked with NOAA on its project to recover artifacts from the U.S.S. Monitor and who testified in favor RMST's proposed

expedition to recover the Marconi Artifacts, has, as I understand it, been removed from his position as the lead Virginia state underwater archeologist.

7. Additionally, other undersea experts necessary for the expedition have stated to me that NOAA has threatened not to hire them for future NOAA projects, i.e. blacklist them, if they work with RMST concerning its attempt to recover the Marconi Artifacts.

8. As a result of NOAA's behind-the-scenes campaign to intimidate vendors and partners, RMST has had difficulty in completing some of the required work that the court has ordered and needs additional time to respond to the Court's financing information date of June 18, 2020.

9. In addition to financial issues caused by NOAA's intimidation efforts, NOAA's political campaign against RMST's salvage rights have caused operational difficulties for any potential expedition. Namely, NOAA has put pressure on other state signatories to the International Agreement to block any RMST expedition from departing from or returning to their territory.

10. In short, in my personal experience, NOAA's interference – both real and threatened – is the greatest obstacle that RMST faces in mounting a safe, viable, and successful expedition to recover the Marconi Artifacts.

I declare under penalty of perjury of the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief.

Dated: June 18, 2020

\_\_\_\_\_/s/\_\_\_\_\_  
Bretton Hunchak